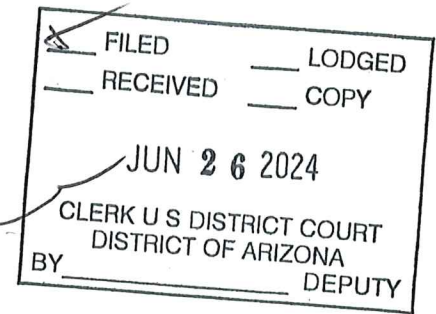


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REDACTED FOR  
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Freddy Iram Zavala Velarde,

Defendant.

No. CR-24-1113-PHX-JJT (MTM)

**INDICTMENT**

VIO: 18 U.S.C. §§ 922(a)(6) and  
924(a)(2)  
(Material False Statement During the  
Purchase of a Firearm)  
Counts 1 - 13

18 U.S.C. §§ 924(d), 981, and 982,  
21 U.S.C. §§ 853 and 881, and  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

**COUNTS 1- 13**

On or about the dates listed below, in the District of Arizona, Defendant FREDDY IRAM ZAVALA VELARDE knowingly made false statements and representations in connection with the acquisition of a firearm to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of a sale of a firearm by the businesses, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed

business, in that Defendant FREDDY IRAM ZAVALA VELARDE did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, in each of the counts below stating he was the actual buyer or transferee of the firearm, and was not buying the firearm on behalf of another person, whereas in truth and fact, Defendant FREDDY IRAM ZAVALA VELARDE knew that he was buying the firearm on behalf of another person:

Count	Date	Business (FFL)
1	1/18/2023	Jones & Jones
2	1/31/2023	Jones & Jones
3	2/3/2023	Sprague's Sports
4	2/3/2023	Firearms Unlimited
5	2/16/2023	Jones & Jones
6	4/3/2023	Jones & Jones
7	4/6/2023	Jones & Jones
8	4/7/2023	Sprague's Sports
9	4/13/2023	Jones & Jones
10	4/19/2023	Jones & Jones
11	4/29/2023	Jones & Jones
12	5/2/2023	Jones & Jones
13	5/17/2023	Jones & Jones

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

### **FORFEITURE ALLEGATION**

The Grand Jury realleges and incorporates the allegations in Counts 1-13 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d), 981, and 982, 21 U.S.C. §§ 853 and 881, and 28 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1-13 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property the defendants is liable. If any forfeitable property, as a result of any act or omission of the defendant:

- 1 (1) cannot be located upon the exercise of due diligence,  
2 (2) has been transferred or sold to, or deposited with, a third party,  
3 (3) has been placed beyond the jurisdiction of the court,  
4 (4) has been substantially diminished in value, or  
5 (5) has been commingled with other property which cannot be divided  
6 without difficulty,

7 it is the intent of the United States to seek forfeiture of any other property of said defendant  
8 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

9 All in accordance with Title 18, United States Code, Sections 924(d), 981, and 982,  
10 Title 21, United States Code, Sections 853 and 881, Title 28, United States Code,  
11 Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

12 A TRUE BILL

13  
14 /s/  
FOREPERSON OF THE GRAND JURY  
15 Date: June 2~~6~~, 2024

16 GARY M. RESTAINO  
17 United States Attorney  
District of Arizona

18  
19 /s/  
JACQUELINE SCHESNOL  
20 Assistant U.S. Attorney  
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